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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 \$15,000.00 U.S. CURRENCY,

13 Defendant.

14 VERIFIED COMPLAINT FOR
15 FORFEITURE *IN REM*

16 Plaintiff, United States of America, by its attorneys, William D. Hyslop, United
17 States Attorney for the Eastern District of Washington, and Brian M. Donovan,
18 Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance
19 with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:
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22 I. NATURE OF THE ACTION

23 1. This is an action to forfeit and condemn to the use and benefit of the
24 United States of America the above-captioned Defendant property seized by the
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1 United States Postal Inspection Service for violations of Title II of the Controlled
2 Substances Act, 21 U.S.C. § 801 *et seq.*

3 II. THE DEFENDANT(S) IN REM
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5 2. The Defendant Property consists of the following property:

6 \$15,000.00 U.S. currency, seized by the United States Postal
7 Inspection Service on May 20, 2020.

8 III. JURISDICTION AND VENUE
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10 3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn
11 the Defendant Property. This Court has jurisdiction over an action commenced by the
12 United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28
13 U.S.C. § 1355(a). This Court has *in rem* jurisdiction over the Defendant Property
14 under 28 U.S.C. § 1355(b).
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16 4. Upon the filing of this complaint, Plaintiff requests that the Court issue
17 an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which Plaintiff will
18 execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule
19 G(3)(c).
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21 5. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1),
22 because the acts or omissions giving rise to the forfeiture occurred in this District.
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24 IV. BASIS FOR FORFEITURE
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26 6. Plaintiff repeats and re-alleges each and every allegation set forth in
27 Paragraphs 1 through 5 above.

1 7. The Defendant Property is liable to condemnation and forfeiture to the
2 United States for its use, in accordance with the provisions of 21 U.S.C. § 881(a)(6),
3 because it constitutes: 1) money, negotiable instruments, securities and other things
4 of value furnished and intended to be furnished in exchange for a controlled substance
5 in violation of the Controlled Substances Act; 2) proceeds traceable to such an
6 exchange; and/or 3) money, negotiable instruments, and securities used and intended
7 to be used to facilitate a violation of the Controlled Substances Act.
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10 V. FACTS

11 8. On or about May 20, 2020, United States Postal Inspection Service
12 (“USPIS”) Postal Inspectors conducted an Express Mail interdiction. This USPIS
13 interdiction took place at the Spokane Processing and Distribution Center, located at
14 2928 South Spotted Road, Spokane, Washington. The interdiction targeted Express
15 Mail parcels possibly containing narcotics or monetary proceeds derived from illegal
16 drug trafficking activity.
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19 9. On or about May 20, 2020, United States Postal Inspectors flagged a
20 parcel (“Subject Parcel”) they wanted to investigate further due to multiple suspicious
21 characteristics, including that the parcel was addressed with a handwritten label, paid
22 for with cash, no phone number was provided for the recipient, and no signature was
23 required for delivery of the parcel. Based on the training and experience of USPIS
24 inspectors, these characteristics were suspicious because legitimate businesses using
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1 the Express Mail service typically use pre-printed labels, whereas narcotics traffickers
2 will often hand-write the labels. Additionally, payment with cash is suspicious
3 because the use of a credit card would more likely enable law enforcement officers to
4 connect the package to identifiable individuals. Also, narcotics traffickers choose not
5 to include phone numbers so as not to enable law enforcement to trace their names or
6 physical locations. Lastly, the fact that no signature was required upon delivery
7 enables delivery to be tracked without affirmative acceptance by an individual who
8 may be under investigation by law enforcement.
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11 10. The Subject Parcel was intended for delivery to “Ronald Strickland, 3328
12 N Stone St, Spokane, WA 99207.” The return address listed on the Subject Parcel was
13 “Mark Conway, 38 Eldred Ave, W Seneca, NY 14224.” It was shipped on May 19,
14 2020 with a scheduled delivery date of May 20, 2020. Using United States Postal
15 Service and law enforcement databases, Inspector Service personnel researched the
16 return address listed on the Subject Parcel. Inspector Service personnel discovered that
17 the address “38 Eldred Ave. Seneca, NY 14224” is a true and deliverable address. A
18 record was returned at the address for an individual named Mark Conway.
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22 11. Inspector Service personnel also searched the recipient address and
23 learned that “3328 N Stone St, Spokane, WA 99207” is a true and deliverable address,
24 but the search did not return a record for Ronald Strickland, but rather for Gage
25 Strickland. Within the last six months, a Chris Barcome and Gage Strickland have
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1 reported to the address. Ronald K Strickland last reported to the address in September
2 2018. Inspectors identified Ronald K Strickland (likely “Sr”) as the intended recipient.
3 A previous address showed Gage Strickland associated to 34008 N. Dunn Rd,
4 Chatteroy, WA 99003. This previous address also listed a record for Ronald K
5 Strickland. Both Ronald and Gage have reported mail to Ronald’s most recent address
6 at 34008 N Dunn Rd, Chatteroy, WA 99003.
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9 12. On June 17, 2020, Inspection Service personnel followed up on an email
10 request by calling the Hays Park station USPO in Spokane, Washington. The
11 supervisor explained that it was a vacant route and they have multiple carriers deliver
12 there. They wrote down names over several days and delivered mail to Gage
13 Strickland and Shayla Strickland.
14

15 13. On May 20, 2020, to further the investigation, the assistance of U.S.
16 Customs & Border Patrol Agent Michael Tafoya (“Agent Tafoya”) and his certified
17 controlled substance detection canine partner, “Buk,” was requested by a Postal
18 Inspector. Due to the suspicious characteristics of the Subject Parcel and those
19 characteristics being associated with narcotics trafficking, Agent Tafoya and canine
20 Buk tested whether the Subject Parcel had an odor of narcotics associated with it. In
21 order to test this, a Postal Inspector placed the Subject Parcel and four other control
22 parcels in an unoccupied hall, at the Spokane P&DC, outside the view of Agent
23 Tafoya and canine Buk. Agent Tafoya then exposed canine Buk to the Subject Parcel
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1 and the four other control parcels. Agent Tafoya notified the Postal Inspector that
2 canine Tessa alerted to the third parcel, which was the Subject Parcel.

3 14. On May 20, 2020, Inspectors called the phone number listed on the
4 mailing label for sender Mark Conway. A female answered and stated Mark Conway
5 was not at home and she would have him return their call. Mark Conway never
6 contacted the USPIS.
7

8 15. On May 20, 2020, Inspectors researched and tried several phone numbers
9 for Ronald Strickland. After several failed attempts, an individual who identified
10 himself as Ronald Strickland answered. He stated to Inspectors that he was expecting
11 a package from New York and sent to his son, Gage's, address. Mr. Strickland
12 explained his father had a stroke a week ago and a friend had sent a sympathy card
13 and a candle for his mother. Inspectors requested consent in order to verify the
14 contents and make sure there were no contraband or non-mailable items inside.
15 Ronald Strickland provided verbal consent by saying, "Yes."
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19 16. The Inspectors opened and located a greeting card in an envelope and a
20 red Tuscan brand candle in glass jar. "Ron" was written on the outside of the
21 envelope. They opened the card and written inside were, "See you soon, can't wait for
22 Mich..." and "Ron, Sorry for the cheap candle, times are tough-". The card's pre-
23 printed message, however, was more in line with a birthday card. The message said,
24 "The bigger you get. The sweeter you grow." The Inspectors then broke the glass
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1 around the candle and located a hard object inside the wax. It had been wrapped in
2 tape. The Inspectors removed red tape from the object, then black tissue paper and
3 found vacuum-sealed plastic which contained \$15,000 in U.S. Currency, the
4 Defendant Property.
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6 17. The Inspectors called Ronald Strickland back on May 20, 2020, and told
7 him they found the Defendant Property. Strickland stated he should have been honest
8 from the start. He then told them he was selling a “Reefer Ranger” machine for rolling
9 hemp joints. He claimed the pieces and parts totaled about \$5,000 for a machine and
10 he had two more machines ready to be sent to Mark Conway the following week
11 Strickland told Inspector to look up Reefer Ranger on the Internet. An Inspector found
12 it and asked if he was the male in the picture. Strickland stated it was his business
13 partner but could not recall Brad’s last name. He also did not know the business
14 address but gave the Inspector a reference of “Freya & Francis” area. Strickland also
15 stated the entire industry is reliant on cash. He claimed he had been selling machines
16 for Brad for a few months.
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21 18. At this point, the Inspector informed him that he was seizing the money
22 as proceeds of narcotics trafficking. He ended the call at 1:21 PM PST, May 20, 2020.
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24 19. Thereafter, on May 20, 2020, the Inspector immediately called a phone
25 number associated to Reefer Ranger. James “Brad” Hellman answered and was asked
26 about his business. He stated he does not have a business partner and that he operates
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1 Reefer Ranger under a legal LLC. He sells each machine from \$2,600 - \$3,600 and
2 has been in business for about 3 years. His business sells two or more machines per
3 day and that most customers pay with direct deposit through bank accounts and some
4 pay with Postal Money Orders. When asked about cash transaction he stated he rarely
5 accepts cash and if he did, it would have to be someone local.
6

7 20. The Inspector asked Mr. Hellman about Ronald Strickland and he
8 answered that he is a buddy who provides leads to him but this only started several
9 weeks ago. Mr. Hellman told the Inspector that he does not consider Strickland a
10 business partner and that Strickland does not engage in side transactions. Mr. Hellman
11 reiterated that Strickland does not ship on behalf of Reefer Ranger and that most of his
12 leads are for Oregon.
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15 21. Mr. Hellman informed the Inspector that Strickland has bought several
16 machines but what he does with them are not his concern. When asked about the
17 information on the mailing label and the contents and the way they were packaged,
18 Mr. Hellman replied that he did not ship a machine to Mark Conway in Seneca, New
19 York and he would never accept cash mailed discreetly from a customer. Mr. Hellman
20 further stated he does not ship USPS and only ships through FedEx. He was sure he
21 did not send or conduct business with Mark Conway.
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25 22. The Inspector received a voicemail a little later on May 20, 2020 from
26 James Hellman. The Inspector returned his call on May 22, 2020. Mr. Hellman
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1 informed the Inspector that Strickland had been conducting business on behalf of
2 Reefer Ranger Mr. Hellman stated that he pays Strickland \$200-\$300 for every
3 machine referred to him. Mr. Hellman went on to say that it had not been Strickland's
4 idea to place the money in a candle and that the money should be returned to him. The
5 Inspector refreshed Mr. Hellman's memory on the details and methods used to
6 conceal the \$15,000 in the candle and the additional layers of concealment. He then
7 asked Mr. Hellman if he would ever accept currency in that manner. Mr. Hellman
8 reiterated that he uses banks and "Doesn't want my business associated to this."
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11 23. Inspectors processed the contents of the subject parcel. The Defendant
12 Property totaled \$15,000 consisting of 150 X \$100 bills in U.S. Currency.
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VI. CONCLUSION

WHEREFORE, Plaintiff requests that the Clerk of the Court issue a warrant for the arrest of the Defendant property; that notice of this action be given to all persons who reasonably appear to be potential claimants of interests in the property; that the Defendant property be forfeited and condemned to the United States of America; that Plaintiff be awarded its costs and disbursements in this action and for such other and further relief as this Court deems proper and just.

DATED this 5th day of November, 2020.

William D. Hyslop
United States Attorney

s/ Brian M. Donovan
Brian M. Donovan
Assistant United States Attorney

VERIFICATION

I, Nicholas R. Underhill, hereby verify and declare under penalty of perjury that I am a United States Postal Inspector with the United States Postal Inspection Service in Seattle, Washington, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except those matters herein stated to be alleged on information and belief, and as to those matters I believe them to be true.

1 The sources of my knowledge and information and the grounds of my belief are
2 the official files and records of the United States and information supplied to me by
3 other law enforcement officers, as well as my investigation of this case, together with
4 others, as a United States Postal Inspector.
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6 I hereby verify and declare under penalty of perjury that the foregoing
7 information is true and correct.
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9 DATED this 5th day of November 2020.

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11 _____
12 Nicholas R. Underhill, U.S. Postal Inspector
13 United States Postal Inspection Service
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Brian M. Donovan, United States Attorney's Office, P.O.
Box 1494, Spokane, WA 99210-1494, (509) 353-2767

DEFENDANTS

\$15,000.00 U.S. Currency

County of Residence of First Listed Defendant Spokane
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PRISONER PETITIONS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability LABOR <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
21 U.S.C. § 853

Brief description of cause:
civil forfeiture of assets for controlled substance violations

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE
November 5, 2020SIGNATURE OF ATTORNEY OF RECORD
s/ Brian M. Donovan**FOR OFFICE USE ONLY**

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____